

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JONG HAM, an individual,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A, a
Delaware corporation,

Defendant.

Case No. 3:23-cv-05698-BJR

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT**

NOTE ON MOTION CALENDAR: August
23, 2023

STIPULATION

Plaintiff, Jong Ham, and Defendant, JPMorgan Chase Bank, N.A. (together the "Parties"),
STIPULATE AND AGREE to extend the deadline for Defendant to respond to Plaintiff's
Complaint to September 19, 2023. The stipulation is based on the following:

WHEREAS, Plaintiff filed his complaint in this action on August 3, 2023;

WHEREAS, the complaint was served on Defendant on August 8, 2023;

WHEREAS, the deadline for Defendant to respond to the complaint under Fed. R. Civ. P.
12(a) is August 29, 2023;

WHEREAS, Defendant requires additional time to review its records and formulate a
response and to accommodate for the intervening Labor Day holiday; and

1 WHEREAS, Plaintiff agrees to provide Defendant with additional time to respond to the
2 Complaint.

3 NOW THEREFORE, the parties stipulate to the following:

4 1. To extend the deadline for the Defendant to respond to the Complaint by 3 weeks,
5 to **September 19, 2023**.

6 2. This stipulation and order shall not operate as an admission of any factual
7 allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim
8 or objection.

9 **STIPULATED AND AGREED TO** this 23rd day of August, 2023.

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11 **CAIRNCROSS & HEMPELMANN, P.S.**

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ORDER

IT IS SO ORDERED.

Dated: August 24, 2023.



Barbara Jacobs Rothstein
U.S. District Court Judge

Presented by:

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